

#4365
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TECHNICAL MEMORANDUM

Utah Coal Regulatory Program

June 21, 2013

TO: Internal File *SKC*
THRU: Steve Christensen, Lead *JS*
FROM: James Owen, Engineer
RE: Add Fence Around Burma Pond, Genwal Resources, Crandall Canyon Mine,
C/015/0032, Task #4365

SUMMARY:

On May 31, 2013, the Utah Division of Oil Gas & Mining received an application for an amendment to the Mining & Reclamation Plan (MRP) of the Crandall Canyon Mine. The application seeks approval to construct a fence around the Burma Pond to prevent accidental access of persons, livestock, and wildlife.

This memo addresses the application's compliance with the engineering (R645-301-500) and bonding (R645-301-800) sections of the Utah Coal Mining Rules. Contents and information provided are sufficient enough to meet the minimum requirements of this section of the Utah Coal Mining Rules. No deficiencies were identified.

Conditional approval is recommended.

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TECHNICAL ANALYSIS:

OPERATION PLAN

SUPPORT FACILITIES AND UTILITY INSTALLATIONS

Regulatory Reference: 30 CFR Sec. 784.30, 817.180, 817.181; R645-301-526.

Analysis:

The fence will be constructed around the Burma Pond to prevent accidental and or unauthorized access of persons, livestock, and wildlife. The fence will also protect the pond liner from damage.

Findings:

Contents and information provided are sufficient enough to meet the minimum requirements of this section of the Utah Coal Mining Rules.

MAPS, PLANS, AND CROSS SECTIONS OF MINING OPERATIONS

Regulatory Reference: 30 CFR Sec. 784.23; R645-301-512, -301-521, -301-542, -301-632, -301-731, -302-323.

Analysis:

The application included updated version of Drawing 4 "Evaporation Basin Plan View" and an update to the As-Constructed map depicting the basin. Both maps show the location and extents of the proposed fence. The maps are certified by Utah P.E. #152606. Final submittals will require certification to be signed and dated.

Findings:

Contents and information provided are sufficient enough to meet the minimum requirements of this section of the Utah Coal Mining Rules. The maps are certified by Utah P.E. #152606. Final submittals will require certification to be signed and dated.

RECLAMATION PLAN

BONDING AND INSURANCE REQUIREMENTS

Regulatory Reference: 30 CFR Sec. 800; R645-301-800, et seq.

Analysis:

The mine currently has surety bonds in place totaling \$2,327,000. The reclamation cost estimated is \$2,294,000. This equate to a positive difference in the bond of \$33,000 (+1.44%), which means that there is adequate bond in place to allow the fence to be built.

The bonding calculation spreadsheets in the approved MRP include the following details for the reclamation costs of the Burma Basin:

Revegetation	\$5,125
Earthwork	\$4,571
Demolition	\$269

While there is sufficient bond in place to allow for construction, there is not a line item in the bond calculation spreadsheet to account for the removal of the fence. The demolition section and summary total sheet will need to be updated to include the fence removal. This can be done through a separate amendment to allow construction to begin as soon as possible.

Findings:

Contents and information provided are sufficient enough to meet the minimum requirements of this section of the Utah Coal Mining Rules.

RECOMMENDATIONS:

Conditional approval is recommended at this time based on submittal of clean copies, and properly certified maps. The operator should submit an additional amendment with the inclusion of the fence as a line item in the demolition portion of the bond calculation spreadsheets. This will allow construction to begin as soon as possible.